



40 Broad Street, 7<sup>th</sup> Floor  
New York, NY 10004  
Telephone: (212) 943-9080

March 7, 2023

**Adrianna R. Grancio**  
Associate  
agrancio@vandallp.com

**VIA ELECTRONIC CASE FILING**

Honorable Jesse M. Furman, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: ***Trustees of the Fulton Fish Market Pension Fund v.  
M. Slavin & Sons, Ltd.; Case No. 22 CV 00187 (JMF)***

Dear Judge Furman:

This firm represents Plaintiffs in the above-referenced matter. Plaintiffs, writing jointly with Defendants, submit this letter to respectfully request a 60-day extension of time to complete fact discovery from March 31, 2023 to May 30, 2023 and a corresponding adjournment of the April 3, 2023 pretrial conference.

As the parties previously informed the Court, on January 13, 2023, Plaintiffs served Defendant Mitchell Slavin and Defendants Ocean Box E-Commerce Corp. f/k/a Ocean Box Corp., Oceanbox Wholesale LLC, Oceanbox Holdings LLC, Oceanbox Direct LLC, and Oceanbox Lifestyles LLC, (collectively, "Oceanbox Defendants"), with notices of deposition for the week of January 23, 2023. On January 19, 2023, Defendant Slavin and Oceanbox Defendants advised Plaintiffs that Defendant Slavin would be representing himself and each of the Oceanbox Defendants at the noticed depositions. At that time, Mr. Slavin stated that he would not be available for his depositions until the second week of February 2023. Based on Defendant Slavin's designation as the representative for Oceanbox Defendants and on Defendants' document production, Plaintiffs anticipated issuing subpoenas to non-parties.

While Plaintiffs anticipated conducting the above-mentioned depositions in mid-February, lead counsel for Plaintiffs separated from the firm of Virginia & Ambinder, LLP on February 17, 2023. Counsel that has taken over the matter from Mr. Harras is coming up to speed on the action and anticipates the exploration of settlement by the parties.

Accordingly, the parties respectfully request an extension of fact discovery for 60 days on account of Plaintiffs' lead counsel's departure and anticipated settlement discussions. This request is the parties' third such request. The Court granted the parties' previous requests, which was prompted by Defendants' substitution of counsel and Defendants' unavailability. The parties do not anticipate using experts, rendering the expert discovery deadline unnecessary. All parties consent to this request.

The parties thank the Court for its time and attention to this matter.

Respectfully submitted,

Honorable Jesse M. Furman, U.S.D.J.  
United States District Court, S.D.N.Y.  
March 7, 2023

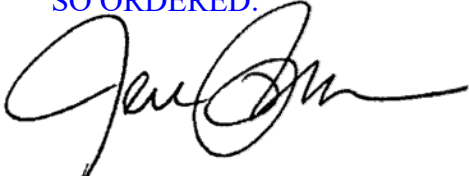
\_\_\_\_\_/s/\_\_\_\_\_  
\_\_\_\_\_

Adrianna R. Grancio

cc: Counsel of Record (via ECF)

Application GRANTED. The pretrial conference scheduled for April 3, 2023, is hereby ADJOURNED to **June 1, 2023, at 9:00 a.m. No further extensions will be granted.** The Clerk of Court is directed to terminate ECF No. 50.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Jesse M. Furman", written over the text "SO ORDERED."

March 7, 2023